



Related to Civil Action No. 3:22-CV-00670-MHL

My Name is Paul Michael Gancarz. It has recently come to my attention that I am named as a defendant in Civil Action No. 3:22-CV-00670-MHL in the US Eastern District Court of Virginia. I do not agree that service was proper however I understand that I am expected to provide a response to the court. I have not been given any adequate amount of time to find an attorney or retain counsel. Not only that, but it is proving very difficult to seek out and retain counsel willing to represent me. I need more time to be able to find and retain counsel and as such I am requesting a 30-day extension to retain counsel and provide a response to this complaint.

Please be aware that I have confirmed with Michael Sheblskie – plaintiffs attorney – who does not oppose a 30-day extension.

I await your response.

Paul M. Gancarz

Paul M. Gancarz
2/27/23

RE: Request for Extension for Paul Gancarz for Civil Action No. 3:22-CV-00670-MHL

From Shebelskie, Michael <mshebelskie@hunton.com>

To Paul Gancarz <paul.gancarz@proton.me>

Date Monday, February 27th, 2023 at 10:40 AM

Mr. Gancarz,

You will need to file a motion with the Court asking for an extension. You can tell the Court in the motion that plaintiffs do not oppose a 30-day extension.

Michael Shebelskie



Michael Shebelskie

Partner

mshebelskie@HuntonAK.com

p 804.788.8716

[bio](#) | [vCard](#)

Hunton Andrews Kurth LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219

HuntonAK.com

From: Paul Gancarz <paul.gancarz@proton.me>

Sent: Sunday, February 26, 2023 1:44 PM

To: Shebelskie, Michael <mshebelskie@hunton.com>

Subject: Request for Extension for Paul Gancarz for Civil Action No. 3:22-CV-00670-MHL

Caution: This email originated from outside of the firm.

Mr. Shebelskie,

My Name is Paul Michael Gancarz. It has recently come to my attention that I am named as a defendant in Civil

Action No. 3:22-CV-00670-MHL in the US Eastern District Court of Virginia. I do not agree with the service however I understand that I am expected to provide a response to the court. I have not been given any amount of time to find an attorney or retain counsel and as such I am requesting a 60 day extension in order to retain counsel to provide a response to this complaint.

I await your response.

Paul M. Gancarz

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

Sealed Plaintiff 1 & 2

Plaintiff(s),

v.

Civil Action Number: 3:22-CV-00670-MHL

Paul Gancarz et. al

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of Motion for extension.
(Title of Document)

Paul Gancarz

Name of Pro Se Party (Print or Type)

Paul M. Gancarz

Signature of Pro Se Party

Executed on: 2/27/23 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of _____.
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of Pro Se Party (Print or Type)

Signature of Pro Se Party

Executed on: _____ (Date)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing:

Motion for Extension

was hand-delivered or served by first class mail on the 27th day of
February 2023 to the following:

Michael Shebelstrie
Hutton Andrews Kunz LLP
Riverfront Plaza, East Tower
951 E. Byrd St.
Richmond, VA 23219

Paul M. Gancarz [sign]

Paul M. Gancarz [print]

Address:

P.O. Box 2114

Virginia Beach, VA 23450

Telephone:

718.744.7091